DRAFT COMMUNICATION PLAN EPA Region 4

Waste Management Division

June 1, 2004

Title:

Central Florida Pilot Radiation Assessment

Importance/Visibility:

High

Projected Announcement Date:

October xx, 2004

1. ACTION:

The Waste Management Division of EPA Region 4 plans to conduct a pilot radiation assessment in central Florida to identify and map former phosphate mining areas that have been redeveloped as residential communities, where radiation levels may exceed background levels for non-mined areas of central Florida.

2. MESSAGE:

Over the last 3 years, Region 4 has been evaluating the potential for increased radiation levels across the large areas of central Florida where phosphate mining once occurred. Information from previous radiation testing and investigations of similar sites in the area suggests that radiation levels could be higher than the average background level for central Florida. As a result, the Agency has chosen, as an initial step, to do a pilot radiation assessment of approximately 70,000 acres, most of which is in Polk County, Florida, near Lakeland, with the remainder in Hillsborough County. The assessment will cover both unmined land and formerly mined areas that have been redeveloped as residential communities. The EPA will measure radiation levels on the ground using a helicopter with special remote sensing equipment that will fly in a grid pattern at approximately 150 feet over the area. Assessment results will help to determine areas for further investigation and the potential for chronic health effects from long-term exposures, if radiation levels are elevated.

3. AUDIENCE/ INTENDED RECIPIENTS OF ACTION:

State of Florida Departments of Environmental Protection and Health Federal and State Elected Officials

Local Elected Officials (counties and cities in and adjacent to assessment areas)

Emergency Response Agencies and Airports

Industry Groups (Florida Phosphate Council and FIPR)

Interested Environmental Groups

Community Organizations and Residents in assessment areas

4. BACKGROUND

In the mid 1980s, the EPA identified and placed a number of former phosphate mining sites in central Florida on the CERCLIS inventory for further investigation. Because these sites are generally located in sparsely populated areas and do not pose a human exposure risk at present, the EPA has not yet taken further action on the sites, with one exception. In the late 1990s, the EPA investigated the former Tenoroc mine near Lakeland, Florida. Information from this investigation expanded the Agency's

understanding of potential conditions that may exist at other former mining sites in central Florida.

In addition, the Agency has reviewed information and results of previous radiation testing conducted by the State and others. From the mid-1970s to the mid-1990s, testing was conducted at the request of developers on land proposed for residential development to identify the need for special construction techniques to prevent exposure to radiation. Other testing has also been conducted, including aerial radiation surveys and radon testing in homes and buildings. In many cases, results of these previous studies revealed radiation levels above background and/or exceeding risk-based standards for protection of human health.

Region 4 is concerned that lands in central Florida where residential development has occurred over mining areas closed in the 1970s could have elevated radiation levels that may pose a long-term health risk. Although these areas are not included on the CERCLIS inventory, the Agency's priority for the pilot radiation assessment is to focus on populated areas. The EPA is taking this action because the State of Florida has no regulatory provisions to conduct investigations of formerly mined areas; however, the Agency is consulting and coordinating with the State in planning the assessment.

5. ANTICIPATED REACTION:

Residents and Property Owners in Assessment Area. The Agency does not believe that residents, workers, or visitors in central Florida are being exposed to radiation levels that would pose an unacceptable short-term or immediate risk. However, the Agency recognizes that notification of the pilot assessment may raise concerns about health effects and/or effects on property values, even before the results are known. Straightforward yet sensitive communication techniques will be used to provide information and address concerns.

<u>Phosphate Industry.</u> The phosphate industry is a major component of the Florida economy, and several companies are seeking permits for new mining operations. Industry representatives may be concerned that news of the pilot radiation assessment will galvanize opposition and/or negatively affect the industry's image. Region 4 has no involvement and takes no stance in the permitting process, and is concerned only with protecting human health and the environment.

Environmental Groups. Certain groups, such as local chapters of the Sierra Club and a Florida group named Manasota 88, are involved in issues related to the phosphate industry. These groups are concerned about the potential effects of contamination from mining operations, and have voiced opposition to new mines in certain areas. The groups may use news of the assessment to support their allegations.

State of Florida. In 1975, the State of Florida established mandatory closure requirements to prevent contamination from closed phosphate mines. State regulatory authority does not extend to potential human health effects associated with mining activities, which is the focus of the EPA assessment. Representatives of FDOH do not believe that radiation in these areas poses a significant risk; however, the agencies are cooperating and providing input to EPA's plans.

6. OVERALL PRODUCT RELEASE/DISTRIBUTION STRATEGY:

Region 4 will notify key groups of the pilot radiation assessment 2 weeks before the flyovers begin. Written materials to be used for notification include a press release, Q&A sheet, and fact sheet in standard EPA format. These materials will be faxed or e-mailed to the identified groups according to the distribution plan in the following section. Region 4 also plans to establish a web site for the Central Florida Phosphate Pilot Radiation Assessment. The web site will be accessed through the Region 4 WMD web site, and will include summary information on the assessment, background information on radiation and the phosphate industry, FAQs, and contact information, along with an e-mail/feedback capability for users to contact the EPA.

7. PRODUCT DISTRIBUTION/ACTION NOTIFICATION PLAN:

Recipient/ Whom to		Who Will		Method of
Notify	Material	Notify	When	Delivery
Federal Officials	EPA Fact Sheet Q&A Sheet	Kristi Watkins	Public Notification Day	e-mail/fax
State Officials	EPA Fact Sheet Q&A Sheet	Rita Wayco	Public Notification Day	e-mail/fax
Local Officials	EPA Fact Sheet Q&A Sheet	EPA Contractors (Mary Wenska/ Suzanne Zoda)	Public Notification Day	e-mail/fax
Emergency Response Agencies/Airports	EPA Fact Sheet Q&A Sheet	EPA Contractors (Mary Wenska/ Suzanne Zoda)	Public Notification Day	e-mail/fax
Industry Groups	EPA Fact Sheet Q&A Sheet	EPA Contractors (Mary Wenska/ Suzanne Zoda)	Public Notification Day	e-mail/fax
Community Organizations/ Environmental Groups	EPA Fact Sheet Q&A Sheet	EPA Contractors (Mary Wenska/ Suzanne Zoda)	Public Notification Day	e-mail/fax
Media	EPA Fact Sheet Q&A Sheet	Carl Terry	Public Notification Day	e-mail/fax

8. KEY TECHNICAL CONTACT:

Carol Monell, Chief, Superfund Remedial and Technical Services Branch 404-562-8719

9. COMMUNICATION CONTACTS:

Carl Terry, Office of External Affairs (Media) 404-562-8325 Kristi Watkins, Office of Congressional Affairs (Federal Legislators) 404-562-8395 Rita Wayco, Office of Congressional Affairs (State Legislators) 404-562-8244

10. STRATEGY APPROVED BY PROGRAM

Region 4	Region 4
Waste Management Division	Office of External Affairs
Date	Date